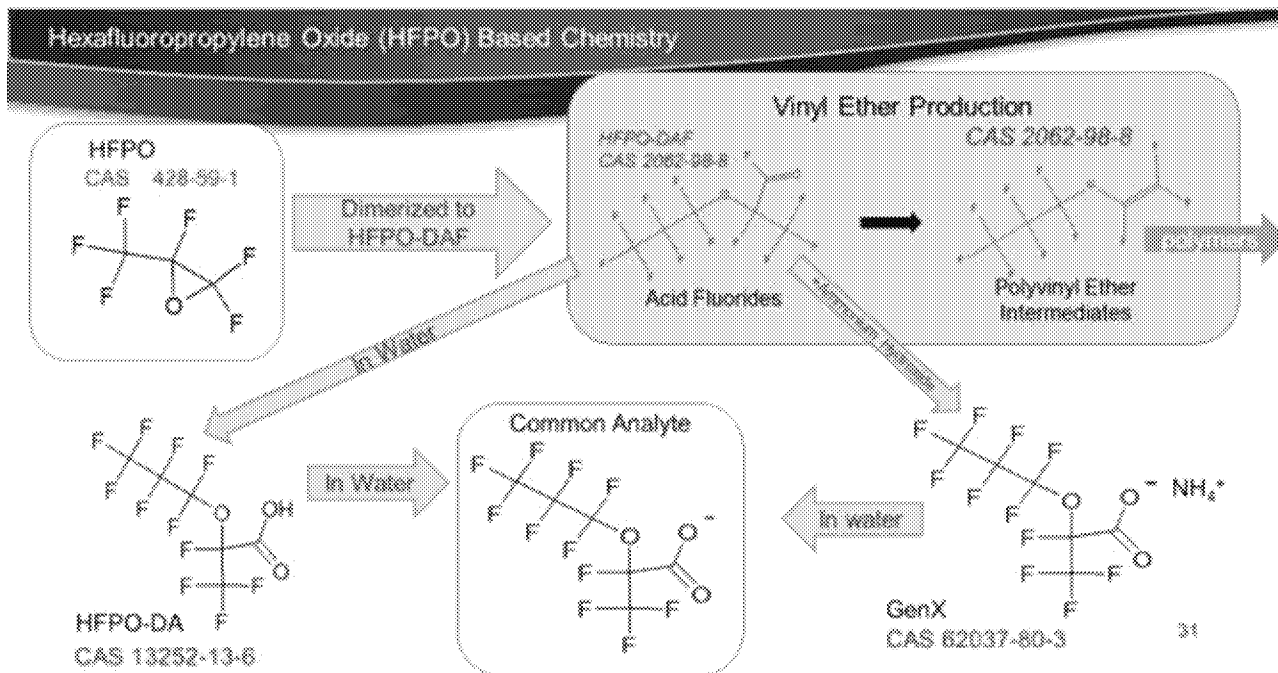


Message

From: Strynar, Mark [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A9910D5B38E471497BD875FD329A20A-STRYNAR, MARK]
Sent: 9/4/2018 5:39:02 PM
To: Lindstrom, Andrew [Lindstrom.Andrew@epa.gov]; Garvey, Mark [Garvey.Mark@epa.gov]
CC: Libelo, Laurence [Libelo.Laurence@epa.gov]; Washington, John [Washington.John@epa.gov]
Subject: RE: Chemours lawsuit filed Aug 29 by Cape Fear Watch

An additional complication is the acid fluoride intermediate (HFPO-DAF) in the production of vinyl ethers also becomes the HFPO-DA anion.



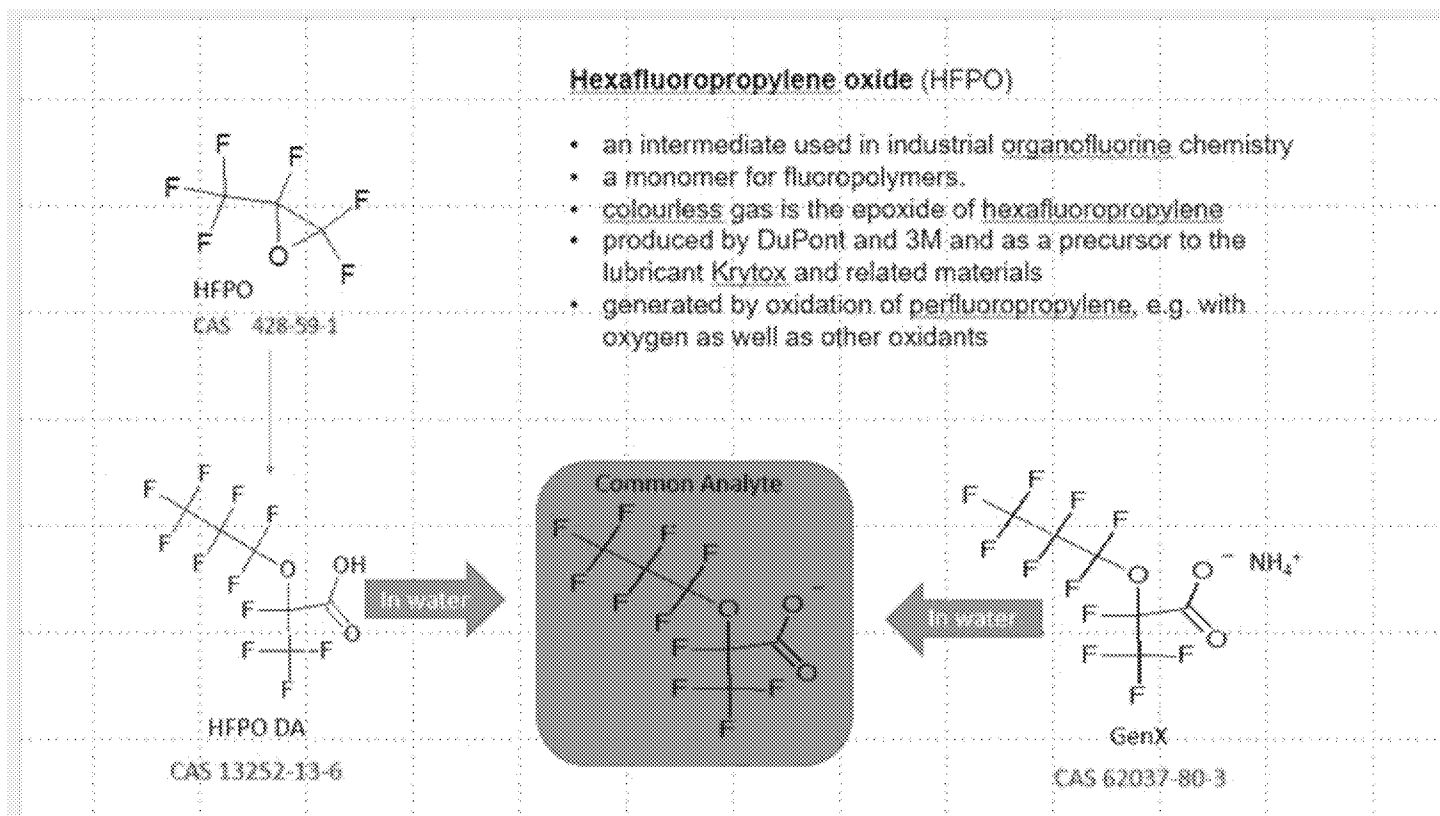
From: Lindstrom, Andrew
Sent: Tuesday, September 04, 2018 1:35 PM
To: Garvey, Mark <Garvey.Mark@epa.gov>
Cc: Strynar, Mark <Strynar.Mark@epa.gov>; Libelo, Laurence <Libelo.Laurence@epa.gov>; Washington, John <Washington.John@epa.gov>
Subject: RE: Chemours lawsuit filed Aug 29 by Cape Fear Watch

Mark,

It's a little complicated, but you're right, The HFPO-DA ammonium salt is one of the compounds that is GenX – the process. As I understand it, the free acid (HFPO-DA) in the figure below is another part of the what is considered "GenX".

The salt and the acid both become the same anionic species in most aqueous environmental media – groundwater, surface water, and blood.

This is the blue section of the PowerPoint that Mark S. made below:



The “common analyte” (as Mark describes it) is what is measured when we use an LC/MS to do analysis. All water data you see on GenX (HFPO-DA) are this compound in the blue section above. So it really doesn’t matter what you start with – the salt or the acid – it all becomes the same thing in water and for an analysis.

Please give me a call at 919-541-0551 if you would like to talk about this sometime.

Thank you,

Andy

From: Garvey, Mark

Sent: Tuesday, September 4, 2018 1:17 PM

To: Lindstrom, Andrew <Lindstrom.Andrew@epa.gov>; Strynar, Mark <strynar.mark@epa.gov>; Washington, John <Washington.John@epa.gov>; Libelo, Laurence <Libelo.Laurence@epa.gov>

Subject: FW: Chemours lawsuit filed Aug 29 by Cape Fear Watch

This group filed a Notice of Citizen Suit 60 days ago and now they are filing the complaint. In paragraph 114 it says: HFPO Dimer Acid Ammonium Salt (CAS 13252-13-6/P-08-508)) readily turns to GenX (CAS 62037-80-3/P-08-509) in the presence of water.

Is that an accurate statement? Does it even make sense? It seems like it is saying GenX converts to GenX in water. I’ve been under the belief that HFPO has to be processed to HFPO Dimer Acid Fluoride to then convert (hydrolyze) to GenX (HFPO-Dimer Acid Ammonium Salt) in water.

I’m trying to understand what they’re trying to say.

Thanks,
Mark

Mark Garvey

EPA Headquarters
Office of Civil Enforcement
Attorney
202-564-4168
garvey.mark@epa.gov

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From: Dalzell, Sally
Sent: Tuesday, September 04, 2018 10:21 AM
To: Garvey, Mark <Garvey.Mark@epa.gov>; Freed, Elisabeth <Freed.Elisabeth@epa.gov>
Cc: Azad, Ava <Azad.Ava@epa.gov>
Subject: FW: Chemours lawsuit

You probably already know about this, but just in case.

Sally

Sally M. Dalzell, Senior Counsel
Federal Facilities Enforcement Office, 2261A
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, D.C. 20004
(202)564-2583
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From: Starfield, Lawrence
Sent: Tuesday, September 04, 2018 8:50 AM
To: Leff, Karin <Leff.Karin@epa.gov>; Dalzell, Sally <Dalzell.Sally@epa.gov>; Azad, Ava <Azad.Ava@epa.gov>; Dixon, Chelsea <Dixon.Chelsea@epa.gov>
Subject: FW: Chemours lawsuit

FYI, a suit against a private party re: PFAS.

Larry

From: Palmer, Leif
Sent: Friday, August 31, 2018 9:44 AM
To: Starfield, Lawrence <Starfield.Lawrence@epa.gov>
Subject: Fwd: Chemours lawsuit

Sent from my iPhone

Begin forwarded message:

From: "Palmer, Leif" <Palmer.Leif@epa.gov>
Date: August 31, 2018 at 9:43:22 AM EDT
To: "Leopold, Matt (OGC)" <Leopold.Matt@epa.gov>, "Bodine, Susan" <bodine.susan@epa.gov>, "Sullivan, Greg" <Sullivan.Greg@epa.gov>, "Kelley, Rosemarie" <Kelley.Rosemarie@epa.gov>, "Albores, Richard" <Albores.Richard@epa.gov>, Larry Starfield <Larry.Starfield@usepa.onmicrosoft.com>
Cc: "Rubini, Suzanne" <Rubini.Suzanne@epa.gov>, "Ghosh, Mita" <Ghosh.Mita@epa.gov>, "Tucker, Marlene" <Tucker.Marlene@epa.gov>, "Nowell, Valerie" <Nowell.Valerie@epa.gov>, "Nagrani, Kavita" <Nagrani.Kavita@epa.gov>
Subject: Fwd: Chemours lawsuit

Hello all — a TSCA & CWA citizen's suit has been filed against the Chemours facility in NC. We've not read it yet — but wanted to pass it on.

Sent from my iPhone

Begin forwarded message:

From: "Nagrani, Kavita" <Nagrani.Kavita@epa.gov>
Date: August 31, 2018 at 9:21:40 AM EDT
To: "Palmer, Leif" <Palmer.Leif@epa.gov>
Cc: "Rubini, Suzanne" <Rubini.Suzanne@epa.gov>, "Tucker, Marlene" <Tucker.Marlene@epa.gov>, "Nowell, Valerie" <Nowell.Valerie@epa.gov>, "Ghosh, Mita" <Ghosh.Mita@epa.gov>
Subject: RE: Chemours lawsuit

Here it is – SELC linked to the complaint.

From: Palmer, Leif
Sent: Friday, August 31, 2018 9:17 AM
To: Nagrani, Kavita <Nagrani.Kavita@epa.gov>
Cc: Rubini, Suzanne <Rubini.Suzanne@epa.gov>; Tucker, Marlene <Tucker.Marlene@epa.gov>; Nowell, Valerie <Nowell.Valerie@epa.gov>; Ghosh, Mita <Ghosh.Mita@epa.gov>
Subject: Re: Chemours lawsuit

Thanks for being alert. Please ask Josh Grimes or Saundi to see if the complaint is available on Pacer.

Marlene — please let Mark Garvey know.

I'll forward to OGC.

Sent from my iPhone

On Aug 31, 2018, at 9:08 AM, Nagrani, Kavita <Nagrani.Kavita@epa.gov> wrote:

Good morning,

I'm not sure if you all have seen this yet. It appears as though Cape Fear River Watch has filed a lawsuit against Chemours in the Eastern District of North Carolina on Wednesday alleging violations of the CWA and TSCA. I haven't read the complaint yet, but SELC's website (below) includes a link to the document.

<https://www.southernenvironment.org/news-and-press/news-feed/groups-sue-chemours-in-federal-court-to-stop-pfas-genx-pollution>

Kavita K. Nagrani, Associate Regional Counsel and Special Assistant
to the Regional Counsel and Deputy Regional Counsel
U.S. Environmental Protection Agency, Region 4
Office of Regional Counsel
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